

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

MILWAUKEE COUNTY, EMPLOYEE'S
RETIREMENT SYSTEM OF THE COUNTY
OF MILWAUKEE, and PENSION BOARD,
EMPLOYEE'S RETIREMENT SYSTEM OF
THE COUNTY OF MILWAUKEE,

Plaintiffs,

Case No. 06-CV-0372

v.

MERCER HUMAN RESOURCE
CONSULTING, INC.,

Defendant.

**DECLARATION OF PAUL D. BAUER IN SUPPORT OF
MERCER'S MOTION IN LIMINE**

I, Paul D. Bauer, under penalty of perjury under the laws of the United States, and pursuant to 28 U.S.C. § 1746, declare that the following facts are true and correct:

1. I am a partner in the Milwaukee office of Quarles & Brady LLP, attorneys for the Defendant, Mercer Human Resource Consulting, Inc., nka Mercer (US) Inc. ("Mercer"). I have been involved in Mercer's defense in this matter from the commencement of this action. I make this declaration upon my personal knowledge.

2. Attached hereto are true and correct copies of the following exhibits:

- **Exhibit 1:** County Executive Scott Walker 2009 Budget Address, September 25, 2008.
- **Exhibit 2:** Milwaukee County 2005 Budget Highlights.

- **Exhibit 3:** Excerpts from the Deposition of Donald Behan, March 6, 2008.
- **Exhibit 4:** Excerpts from the Deposition of Glenn Soderstrom, April 3, 2007.
- **Exhibit 5:** Excerpts from the Deposition of Dennis Skelly, April 10, 2007.
- **Exhibit 6:** Excerpts from the Deposition of Kim Nicholl, January 10, 2008.
- **Exhibit 7:** Excerpts from the Deposition of Stuart Piltch, October 8, 2007.

Dated this 5th day of November, 2008.

s/ Paul D. Bauer